

To:

Species at Risk Recovery Section
Species Conservation Policy Branch
Ministry of Natural Resources and Forestry
300 Water Street, 5N
Peterborough, ON K9J 8M5

From:

Animal Alliance of Canada
Animal Protection Party of Canada
Born Free USA
Canadians for Furbearers
Coyote Watch Canada
Humane Society International/Canada
Ottawa-Carleton Wildlife Centre
The Fur-Bearers
Zoocheck

Date: February 14, 2018

Subject: 013-1813 Request for additional information to be considered in the development of the recovery strategy for Algonquin Wolf under the Endangered Species Act, 2007

Dear Sir or Madam,

We thank you for this opportunity to comment on the draft Recovery Strategy for the Algonquin wolf, a unique and threatened species in Ontario.

In general, the Strategy outlines the best available science, but in some areas fails to include research or the precautionary principle in the development of recovery approaches and timelines. We outline what concerns we have below.

1. **Recovery Goal:**

The draft Strategy states that the Recovery Goal is "to have a self-sustaining population in the Algonquin Wolf Recovery Zone [AWRZ]." The self-sustaining aspect of this goal is too vague. It could ultimately allow ongoing hunting and trapping of an at-risk apex predator population without consideration of the effects that such management has on the species. These effects include, but probably are not limited to social and reproductive dynamics.

We recommend the goal be changed to read: "to have a naturally functioning, socially intact and numerically self-sustaining population in the Algonquin Wolf Recovery Zone."

2. **Extent of Algonquin Wolf Recovery Zone:**

The extent of occurrence for this species is more than twice the size of the current Algonquin Wolf Recovery Zone and we are concerned that elimination of peripheral areas from the AWRZ will not sufficiently protect the species either in the short or the long term.

We recommend that the AWRZ include all wildlife management units that contain any part of the extent of occurrence and that hunting and trapping be prohibited across this area because:

- this would widen the corridor that theoretically provides genetic connectivity to the Quebec population;
- the current AWRZ does not protect animals found distally from the core of the AWRZ, and there is no evidence to suggest that more Algonquin wolves do not exist in these areas (they are under-surveyed as per Figure 1), and that some of them may be breeding. Since protection from hunting and trapping may contribute positively to conspecific mating, this could support expansion of the population;
- dispersing wolves are almost 3 times more likely to be killed than resident wolves, indicating their protection should be emphasized; and
- we do not have a thorough understanding of hybridization dynamics between grey/Great Lakes Boreal wolves and Algonquin wolves

3. **Mitigation vs. Elimination of Threats:**

The Ontario Government's interim approach for Algonquin wolves was to strip them of the province-wide protection afforded to all threatened species under the Endangered Species Act. This decision was made because of confusion between Algonquin wolves and eastern coyotes, which look similar. This decision indicates that the Ontario government is not interested in prioritizing the species' recovery, despite having funded and directly supervised much of the research on this wolf population.

We recommend that the draft Strategy clarify that human-caused mortality in the form of hunting and trapping be eliminated by prohibiting these actions across the AWRZ.

In addition, further mitigation measures should apply to direct human-caused mortality from vehicular collisions, and “in defence of property” actions. Clear strategies for mitigation need to be developed. With respect to vehicular collisions, the strategies should include:

- a government subsidized study on the travel corridors for Algonquin wolves and whether existing barriers affect their movement and survival along Highway 400/69;
- identification of high risk collision areas;
- signage, speed reduction and barriers designed to reduce mortality for those high risk areas; and
- determination of how existing and potential overpasses help connect Killarney and Algonquin populations;

Public safety can be ensured with proper wildlife-human coexistence strategies in built-up areas, such as:

- legislation that prevents people from feeding wolves, coyotes and other wildlife; and

- legislation, signage and enforcement requiring dogs to be leashed on crown land and in protected areas including conservation reserves.

As part of a mitigation measure, the MNRF should remove the required beaver quotas for trappers since beavers are a significant food source for wolves.

4. **Livestock Depredation Prevention and Compensation:**

The section on Livestock Depredation in the draft Recovery Strategy is weak. We point out that it is incorrect to rely on statistics that show wolves are responsible for fewer livestock losses than coyotes in Ontario, because it is often impossible to differentiate between these attacks, and additionally because the animals themselves are difficult to distinguish.

We recommend a concise but thorough summary of literature regarding livestock depredation by wolves and coyotes, as well as analyses of methods and their effectiveness at reducing such losses. The Strategy should include direction for MNRF and OMAFRA to test and help farmers implement effective non-lethal strategies to prevent livestock death and injury by wild carnivores including wolves and coyotes. Compensating farmers once depredations have happened, without requiring them to non-lethally prevent conflicts in the first place, does not support wolf recovery and may also be a waste of farmer's time and taxpayer money considering research indicates hunting/trapping does not alleviate losses. However, farmers' tolerance of wild carnivores is generally very low, and they do not have access and/or the willingness to accept science that indicates that hunting/trapping can in fact exacerbate conflicts with their agricultural animals or the agriculture animals nearby. Therefore, the draft Strategy must take the first step by discussing this directly, and providing direction for governments to mitigate the killing of wolves and coyotes in defense of property.

For non lethal mitigation measure, we recommend the publication by Wolf Awareness, titled, "A Rancher's Guide: Co-existence Among Livestock, People and Wolves.

<http://wolfawarenessinc.org/wp-content/uploads/2016/07/Wolf-Awareness-Ranchers-Guide-2nd-Ed..pdf>

5. **Management Techniques:**

We emphasize that the use of snares to trap large canids is cruel and indiscriminate, resulting in the death of non-target species (Hervieux et al. 2014 supplementary information) and extreme suffering by trapped individuals (Proulx et al. 2016). We recommend the strategy include direction to prohibit the use of snares in Ontario to better safeguard threatened Algonquin wolves and other threatened wildlife that have been trapped in snares set for wolves in Canada (e.g. birds of prey, wolverines, woodland caribou). This would support the statement about the "inherent" value of wolves in the provincial Strategy for Wolf Conservation.

We recommend that the government require reporting by all those who hunt or trap canid species. Currently reporting is not required in Southern Ontario, and this not only creates a knowledge gap about the number of animals killed and potential population sizes, but encourages intolerance and devaluation of these species.

References:

Hervieux, Dave, et al. "Managing wolves (*Canis lupus*) to recover threatened woodland caribou (*Rangifer tarandus caribou*) in Alberta." *Canadian Journal of Zoology* 92.12 (2014): 1029-1037. (Supplementary information)

Penteriani, V., et al. (2016). Human behaviour can trigger large carnivore attacks in developed countries. *Scientific Reports*, 6. DOI: [10.1038/srep20552](https://doi.org/10.1038/srep20552)

Proulx, G., et al. "Humaneness and selectivity of killing neck snares used to capture canids in Canada: A review." *Can. Wildl. Biol. Manag* 4 (2015): 55-65.